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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 LEONARD JAMES SHOVE,

15 Defendant.

Case No. 2:23-cr-00195-CDS-BNW

**STIPULATION TO CONTINUE
OBJECTIONS TO REPORT AND
RECOMMENDATION (ECF NO. 61)**

(First Request)

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18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
19 United States Attorney, and Jean Ripley, Assistant United States Attorney, counsel for the
20 United States of America, and Rene L. Valladares, Federal Public Defender, and Aden Kahssai,
21 Assistant Federal Public Defender, counsel for Leonard James Shove, that the Objection
22 deadline to the Report and Recommendation (ECF No. 64) currently set for November 13,
23 2024, be vacated and continued to December 4, 2024 and the Government's response be due
24 December 20, 2024.

25 The Stipulation is entered into for the following reasons:

26 1. Mr. Shove filed a motion to suppress for which an evidentiary hearing was held
on September 26, 2024. The Court filed an Order and Report and Recommendation on
November 6, 2024. The parties are requesting the Court continue the deadline for objections

1 for three (3) weeks because defense counsel needs additional time to speak to Mr. Shove about
2 the Report and Recommendation and prepare objections. The government will need additional
3 amount of time to respond.

4 2. The defendant is incarcerated and does not object to the continuance.

5 3. The parties agree to the continuance.

6 4. A stipulation to continue the trial dates is being filed concurrently herewith.

7 5. The additional time requested herein is not sought for purposes of delay, but
8 merely to allow counsel for defendant sufficient time within which to be able to effectively and
9 complete investigation of the discovery materials provided.

10 6. Additionally, denial of this request for continuance could result in a miscarriage
11 of justice. The additional time requested by this Stipulation is excludable in computing the time
12 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
13 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
14 Section 3161(h)(7)(B)(i), (iv).

15 This is the first stipulation to continue filed herein.

16 DATED this 13th day of November, 2024.

17 RENE L. VALLADARES
18 Federal Public Defender

JASON M. FRIERSON
United States Attorney

19 By: Aden Kahssai

By: Jean Ripley

20 ADEN KAHSSAI
Assistant Federal Public Defender

JEAN RIPLEY
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4
5 Plaintiff,
6 v.
7 LEONARD JAMES SHOVE,
8 Defendant.

Case No. 2:23-cr-00195-CDS-BNW

9
10 **ORDER**

11 IT IS THEREFORE ORDERED that the Objection deadline to the Report and
12 Recommendation (ECF No. 64) currently set for November 13, 2024, be vacated and continued
13 to December 4, 2024 and the Government's response be due December 20, 2024.

14 DATED this 18 day of November, 2024.

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18 UNITED STATES MAGISTRATE JUDGE
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